

SPX Corporation

SPX Corporation
13515 Ballantyne Corporate Place
Charlotte, NC 28277 USA
Phone 704-752-4400
Fax 704-752-4505

Writer's Direct Dial: (704) 752-4423
Writer's Fax: (704) 752-7436
E-mail Address: john.burtis@spx.com

June 23, 2004

Ms. Marsha A. Adams
Remedial Enforcement Support Section
United States Environmental Protection Agency
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

**RE: Chemical Recovery Systems Site, Elyria, Ohio
General Notice of Potential Liability and Request for Information
Chemetron Process Equip.**

Dear Ms. Adams:

This acknowledges receipt of your June 3, 2004 letter regarding the above-referenced matter. That letter was directed to Chemetron Process Equip. c/o SPX Valves and Controls. Based on the following history of Chemetron as relates to SPX Corporation, SPX has no legal connection with the Chemical Recovery Systems site because no predecessor of SPX ever owned or operated the site and no predecessor of SPX ever generated, transported, treated or disposed of hazardous substances to or at the site.

On December 9, 1982, one year after operations at the Chemical Recovery Systems site ceased, AMCA International Corporation purchased certain assets of Chemetron Process Equipment, Inc. from Allegheny International, Inc. These assets included two specific product lines, one located in Jeffersontown, Kentucky and one located in Oakland, California. This was an asset acquisition.

In April 1990, AMCA International Corporation changed its name to United Dominion Industries, Inc. In May 2001, United Dominion Industries Inc. was acquired by SPX Corporation in a stock acquisition.

Thus, at no time from the 1940's, when the Chemical Recovery Systems site was opened, through 1981, when the Chemical Recovery Systems site was closed, did SPX Corporation or any of its predecessors own or have any ownership interest in Chemetron Process Equipment. It was only after closure of the Chemical Recovery Systems site that certain assets of Chemetron Process Equipment were acquired by a predecessor of SPX Corporation.

Based on the foregoing, SPX Corporation has no legal responsibility regarding this site and will not be responding to the Request for Information you have provided.

Sincerely yours,

John M. Burtis
Director, Claims & Litigation

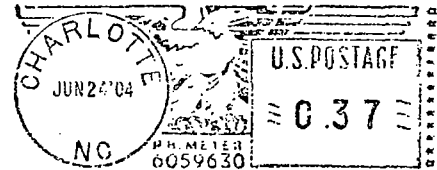
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US EPA RECORDS CENTER REGION 5



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60604+3590 10

